

# **EXHIBIT 7**

**CONTAINS CONFIDENTIAL INFORMATION  
SUBJECT TO PROTECTIVE ORDER**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION	MDL No. 2804; Case No. 17-md-2804
This document relates to: Track One Cases	Judge Dan Aaron Polster

**RITE AID OF MARYLAND, INC.'S SECOND SUPPLEMENTAL OBJECTIONS AND  
ANSWERS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES  
NOS. 2, 4-10, 12-15, 17-18, 20, 23-28, 30, 32-33, and 35**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Rite Aid of Maryland, Inc., d/b/a Rite Aid Mid-Atlantic Customer Support Center ("Rite Aid of Maryland")<sup>1</sup> supplements its objections and responses to Interrogatory Nos. 2, 4-10, 12-15, 17-18, 20, 23-28, 30, 32, 33, and 35<sup>2</sup> of Plaintiffs' First Set of Interrogatories (the "Interrogatories"), as set out below.

**PRELIMINARY STATEMENT**

1. These Objections and Answers are made without waiving, or intending to waive, (i) any objections as to the competency, relevancy, materiality, privilege, or admissibility of information or documents provided in response to the Interrogatories; (ii) the right to object on any ground to the use of the information or documents provided in response to the Interrogatories at any hearing or trial; (iii) the right to object on any ground at any time to a request for further

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<sup>1</sup> The Interrogatories are directed at Rite Aid Corporation ("RAC"). RAC is no longer a defendant in any of the Track One cases. Rite Aid of Maryland remains a defendant. Accordingly, in the interest of expediency, Rite Aid of Maryland responds as if these Interrogatories are directed at it and not at RAC.

<sup>2</sup> Rite Aid of Maryland served its original responses on July 5, 2018. Rite Aid of Maryland served supplemental responses to Interrogatory Nos. 1, 3, 5, 11, 15-20, 22, 28, 29, 31, and 34 on September 21, 2018.

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Prevention department would initiate an investigation and open a case in LPMS (formerly known as NaviCase and EthicsPoint).

**INTERROGATORY NO. 7:** Please Identify all industry associations or other organizations that provided education, information, services or had any involvement with the use, safety, efficacy, production, marketing, sale, dispensing or distribution of Opioid and/or Opioid Products that You are or were a member of, or to which You provided financial or other support, from 1990 to present. Additionally, identify what if any positions Your employees, officers, or directors have held with any such organizations from January 1, 1990 to present.

**AMENDED ANSWER:** Subject to and without waiving the foregoing objections and Rite Aid of Maryland's prior objections to this Interrogatory, Rite Aid of Maryland responds as follows:

Rite Aid of Maryland does not track, in the ordinary course, the outside organizations to which its employees belong. Based upon a reasonable investigation, Rite Aid Hqtrs. Corp. paid membership dues to the National Association of Chain Drug Stores ("NACDS") and the Maryland Association of Chain Drug Stores during the relevant time period. In addition, during the relevant time period, Janet Getzey Hart (Director, Government Affairs, Rite Aid Hqtrs. Corp.) regularly attended and participated in meetings with the following organizations: NACDS, the Maryland Association of Chain Drug Stores, the National Association of State Controlled Substances Administrators ("NASCSA"), and National Association of Boards of Pharmacy ("NABP"). Rite Aid of Maryland further responds that John Standley was elected as the chairman of NACDS in 2014. Rite Aid of Maryland also responds that it maintained a Verified-Accredited Wholesale Distributors ("VAWD") accreditation from NABP from 2007 through the time it stopped distributing controlled substances in October 2014.

**INTERROGATORY NO. 8:** Please Identify any Customer, including any Defendant in this case, to whom You provided (by sale or otherwise) data regarding the distribution and/or dispensing of Opioids or Opioid Products, and describe in detail the data You provided and the date that You provided the data. Plaintiffs limit this request to the state of Ohio from January 1, 1990 to present.

VERIFICATION

I, Janet Getzey Hart, am the Director of Government Affairs for Rite Aid, and I am authorized to make this verification on behalf of the company. I have reviewed Interrogatory Responses 2, 4-5, 7-9, 12, 14-15, 17-18, 20, 23-24, 27-28, 30, and 35, and the portions of Interrogatory Responses 6 and 13 that do not relate to the Auto-Replenishment System, and the corresponding objections. The factual information provided in the answers is true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Date:

1-24-19

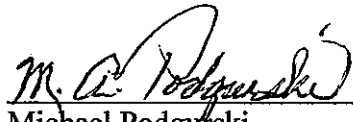
  
Janet Getzey Hart

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**VERIFICATION**

I, Michael Podgurski, was the Vice President of Pharmacy Services for Rite Aid before I retired in November 2018. I am authorized to make this verification on behalf of the company. I have reviewed Interrogatory Response No. 26, and the portion of Interrogatory Response No. 2 relating to Rite Aid Pharmacy No. 777. The factual information provided in the answers is true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Date: 1-18-19

  
Michael Podgurski

State of Florida

County of Pinellas

Sworn to (or affirmed) and subscribed before me

this 18 day of January, 2019  
(Date) (Month) (Year)

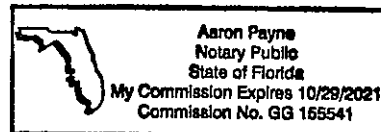
by Michael A. Podgurski  
(Name of Affiant)

 (Seal)  
(Signature of Notary Public - State of Florida)

Aaron Payne  
(Name of Notary Public)

Personally Known \_\_\_\_\_ OR Produced Identification X

Type of Identification Produced FL DL



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VERIFICATION

I, Marcia Brumbaugh, am the Systems Manager of Pharmacy Replenishment for Rite Aid, and I am authorized to make this verification on behalf of the company. I have reviewed Interrogatory Response 10, and the portions of Interrogatory Responses 6 and 13 relating to the Auto-Replenishment System, and the corresponding objections. The factual information provided in the answers is true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Date:

1-22-19

  
\_\_\_\_\_  
Marcia Brumbaugh

VERIFICATION

I, Amanda Glover, am the Vice President of Regulatory Affairs for Rite Aid, and I am authorized to make this verification on behalf of the company. I have reviewed Interrogatory Response 25, and the corresponding objections. The factual information provided in the answer is true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Date:

1/25/19

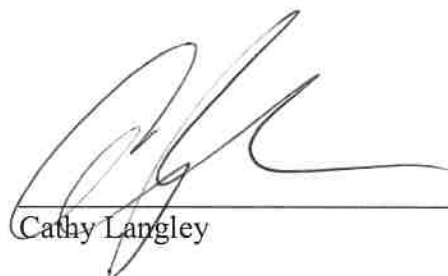
  
Amanda Glover

VERIFICATION

I, Cathy Langley, am the Senior Director of the Corporate Loss Prevention department for Rite Aid, and I am authorized to make this verification on behalf of the company. I have reviewed Interrogatory Responses 32 and 33 and the corresponding objections. The factual information provided in the answers is true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Date:

1/23/19



Cathy Langley